

**REPORTS ANALYSIS REFERRAL****TO****OFFICE OF GENERAL COUNSEL****DATE: August 12, 2008****ANALYST: Rosa Lewis**

**I. COMMITTEE:** Leading Us in Success Political Action Committee  
(LUISPAC)  
C00408054  
Maria A. Sanchez Bras, Treasurer (2/20/08 - present)  
Christopher J. Ward, Treasurer (11/24/04 - 2/19/08)  
P.O. Box 40585  
Washington, DC 20016

**II. RELEVANT STATUTE:** 2 U.S.C. §432(b)(3)  
2 U.S.C. §432(c)(5)  
2 U.S.C. §432(h)(1)  
2 U.S.C. §434(b)(4)(H)(v)  
2 U.S.C. §434(b)(6)(B)(v)  
2 U.S.C. §439a(b)  
11 CFR §102.9(a)(2)  
11 CFR §102.9(b)(1)  
11 CFR §102.15

**III. BACKGROUND:****Other Violations of the Federal Election Campaign Act (Unauthorized Disbursement of Committee Funds)**

During an internal review of its financial activity, the Leading Us in Success Political Action Committee (LUISPAC) ("the Committee") discovered unauthorized receipt and disbursement of Committee funds totaling \$23,500.00 and \$41,000.00, respectively, by the Committee's former Treasurer, Christopher J. Ward. These transactions were not disclosed on the Committee's reports.

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On June 20, 2008, the Committee filed an Amended 2007 May Monthly Report covering the period from April 1 to April 30, 2007; an Amended August Monthly Report covering from July 1 to July 31, 2007; an Amended September Monthly Report covering from August 1 to August 31, 2007; an Amended 2008 February Monthly Report covering from January 1 to January 31, 2008, and an Amended 2008 March Monthly Report covering from February 1 to February 29, 2008.

The Amended 2007 May Monthly, Amended 2007 August Monthly, and Amended 2007 September Monthly Reports disclosed three (3) disbursements to Christopher J. Ward totaling \$40,000.00 on Schedule B supporting Line 29 (Other Disbursements) with the purpose "Unauthorized Disbursement" (Images 28991323800, 28991323649, and 28991323802). The Amended 2008 February Monthly Report disclosed one (1) \$1,000.00 disbursement to SAXPAC (Safeguarding America by Expanding National Security) on Schedule B for Line 29 (Other Disbursements) with the purpose "Unauthorized Political Contribution" (Image 28931953833). The Amended 2008 March Monthly Report disclosed one (1) \$23,500 receipt from Christopher J. Ward on Schedule A supporting Line 17 (Other Federal Receipts) with the purpose "Refund - Unauthorized Disbursement" (Image 28991324966) (Attachment 2).

On July 11, 2008, after reviewing the amended reports, the Reports Analysis Division (RAD) Analyst called to speak with Ms. Maria Sanchez Bras, the Committee's Treasurer, about the unauthorized activity disclosed on the Committee's amended reports received June 20, 2008. The Analyst left a message stating that the apparent unauthorized activity would need to be referred for legal action and left contact information with a request that Ms. Sanchez Bras return the call to discuss the matter in more detail (Attachment 3).

On July 16, 2008, the RAD Analyst called Ms. Sanchez Bras to discuss the apparent unauthorized activity disclosed on the Committee's amended reports. The Analyst told Ms. Sanchez Bras that the apparent unauthorized activity disclosed in the reports would need to be referred for legal action and asked if she could provide any additional information. Ms. Sanchez Bras stated that she had been contacted by the Federal Bureau of Investigation (FBI) and is currently working with them to provide any documentation of Mr. Ward's unauthorized activity. The Committee hired an outside firm to audit the Committee, after which the firm amended the Committee's reports to more accurately disclose their activity. The Analyst asked if the activity disclosed as unauthorized disbursements was the only discrepancy that the firm found, and whether the audit was still ongoing. Ms. Sanchez Bras stated that to her knowledge, the embezzlement took place as disclosed on the amended reports, and that Mr. Ward wrote checks, but did not keep copies, so the Committee is working with their bank to get copies of the checks. Ms. Sanchez Bras stated that since she is in Puerto Rico, lawyers have been hired to help the Committee with this issue and to work with the FBI in Washington, DC. The Analyst stated that someone from the Commission's legal division would contact her if additional information was required (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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LEADING US IN SUCCESS POLITICAL ACTION COMMITTEE (LUISAPAC)  
Sanchez Bras, Maria A.  
FILING FREQUENCY: MONTHLY

PO BOX 40385

WASHINGTON

NON-PARTY QUALIFIED  
DC 20018

ID #C00408054

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG INAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1		A		1/27/2008	4	28890118412						
1		A		2/20/2008	4	28890490193						
NS		T		1/29/2007	1	27940082109						
NS		T		4/11/2007	1	27930487563						
RQ	NS	2		7/16/2008	3	28039782878	4/01/2007 4/30/2007					
RQ	NS	2		7/16/2008	3	28039782875	2/01/2008 2/28/2008					
3	NS	N	P	2/20/2007	10	27930185441	1/01/2007 1/31/2007	82708	3500	18153	57054	0
3	NS	A	P	8/20/2008	10	28931941085	1/01/2007 1/31/2007	89708	3500	18153	57054	0
3	NS	N	P	8/20/2007	7	27930384564	2/01/2007 2/28/2007	53914	0	4199	53931	0
3	NS	A	P	8/20/2008	9	28931328681	2/01/2007 2/28/2007	53914	3800	8194	50199	0
3	NS	N	P	4/20/2007	6	27930667891	3/01/2007 3/31/2007	52931	0	2500	50431	0
3	NS	A	P	8/20/2008	6	28931323570	3/01/2007 3/31/2007	52931	0	2294	54059	0
3	NS	N	P	5/18/2007	6	27930734087	4/01/2007 4/30/2007	50431	0	1588	48883	0
3	NS	A	P	8/20/2008	7	28931323594	4/01/2007 4/30/2007	50431	0	20500	33868	0
3	NS	N	P	6/20/2007	7	27930841288	5/01/2007 5/31/2007	48883	5000	304	53559	0
3	NS	A	P	8/20/2008	8	28931323620	5/01/2007 5/31/2007	48883	18000	0	43559	0
3	NS	N	P	7/18/2007	6	27930322807	6/01/2007 6/30/2007	53559	0	1000	52559	0
3	NS	A	P	8/20/2008	6	28931323620	6/01/2007 6/30/2007	49559	0	1600	42559	0
3	NS	N	P	8/20/2007	7	27931118017	7/01/2007 7/31/2007	52559	0	3000	49559	0
3	NS	A	P	8/20/2008	8	28931323642	7/01/2007 7/31/2007	42559	0	12000	30559	0
3	NS	N	P	9/20/2007	6	27931218063	8/01/2007 8/31/2007	30559	0	7200	42359	0
3	NS	A	P	8/20/2008	8	28931323796	8/01/2007 8/31/2007	30559	0	17200	13359	3800
3	NS	N	P	10/04/2007	7	27931281568	9/01/2007 9/30/2007	43988	5000	8633	38528	0
3	NS	A	P	8/20/2008	8	28931953280	9/01/2007 9/30/2007	13359	5000	1133	17228	7200
3	NS	N	P	11/13/2007	6	27931558375	10/01/2007 10/31/2007	38528	100	5100	33528	0

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LEADING US IN SUCCESS POLITICAL ACTION COMMITTEE (LUISAPAC)  
Sanchez Bras, Maria A.  
FILING FREQUENCY: MONTHLY

PO BOX 40385

WASHINGTON

NON-PARTY QUALIFIED  
DC 20015

ID #C00408054

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M11	A	P	8/20/2008	7	28991324061	10/01/2007 10/31/2007	17226	0	7700	9526	0
3	M12	N	P	12/20/2007	8	27991044314	11/01/2007 11/30/2007	35326	1250	7652	27124	0
3	M12	A	P	8/20/2008	8	28931953377	11/01/2007 11/30/2007	9526	1250	4952	5824	0
3	YE	N	P	1/21/2008	12	28931953377	12/01/2007 12/31/2007	31124	8100	13087	21837	0
3	YE	A	P	8/20/2008	11	28931953377	12/01/2007 12/31/2007	5824	8100	10987	2937	0
3	M2	N	P	2/20/2008	8	28990480197	1/01/2008 1/31/2008	21537	2000	1898	23537	0
3	M2	A	P	8/20/2008	7	28931953377	1/01/2008 1/31/2008	2937	0	5800	2682	0
3	M3	N	P	3/20/2008	8	28930624431	2/01/2008 2/29/2008	22837	0	3608	18937	0
3	M3	A	P	8/20/2008	8	28991324061	2/01/2008 2/29/2008	2932	25900	12	20825	0
3	M4	N	P	4/18/2008	5	28931221885	3/01/2008 3/31/2008	18887	0	24	18913	0
3	M4	A	P	8/20/2008	5	28931221885	3/01/2008 3/31/2008	28885	0	12	20813	0
3	M5	N	P	5/20/2008	5	28931811758	4/01/2008 4/30/2008	18913	0	65	18847	0
3	M5	A	P	8/20/2008	5	28931854879	4/01/2008 4/30/2008	22813	0	65	20747	0
3	M6	N	P	6/20/2008	5	28991326149	5/01/2008 5/31/2008	20747	0	0	20747	0
3	M7	N	P	7/18/2008	5	28932271899	6/01/2008 6/30/2008	20747	0	0	20747	0
TOTAL								68826	105308			

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**Leading Us in Success Political Action Committee (LUISPAC) (C00408054)**  
**2007-2008 Election Cycle**

**Overview of Unauthorized Receipts**

Report Name	Amount	Paid To	Purpose	Image Number
Amended 2008 March Monthly Report	\$23,500.00	Christopher J. Ward	Refund – Unauthorized Disbursement	28991324966

**Overview of Unauthorized Disbursements**

Report Name	Amount	Paid To	Purpose	Image Number
Amended 2007 May Monthly Report	\$20,000.00	Christopher J. Ward	Unauthorized Disbursement	28991323600
Amended 2007 August Monthly Report	\$10,000.00	Christopher J. Ward	Unauthorized Disbursement	28991323649
Amended 2007 September Monthly Report	\$10,000.00	Christopher J. Ward	Unauthorized Disbursement	28991323802
Amended 2008 February Monthly Report	\$1,000.00	SAXPAC	Unauthorized Disbursement	28931953933